

EIS002043

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February 24, 2000

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FEB 25 2000

Wendy Dixon
EIS Project Manager
U. S. Department of Energy
Yucca Mountain Site Characterization
Project Office
P. O. Box 30307, Mail Stop 010
North Las Vegas, Nevada 89036-0307

Dear Ms. Dixon:

The Board of Esmeralda County Commissioners are submitting these comments to the Draft Environmental Impact Statement (DEIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain. Esmeralda County is submitting these comments with the expectation that they will be incorporated in the Final Environmental Impact Statement. The DEIS fails to address methods for mitigating impacts of the repository program. We expect that impact mitigation plans will be defined in detail in the final environmental impact statement.

When the Final Environmental Impact Statement is released we request a presentation by the DOE to our Board to discuss how the DOE responded to our specific comments.

Please feel free to contact me should you have any questions regarding these comments.

Sincerely,

Harriet Ealey, Commissioner
Esmeralda County

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**Esmeralda County Comments on the Draft Environmental
Impact Statement for a Geologic Repository for the
Disposal of Spent Nuclear Fuel and High-Level
Radioactive Waste at Yucca Mountain**

Submitted Via E-mail and U.S. Postal Service To:

Wendy Dixon, Yucca Mountain Site Characterization Office, United States
Department of Energy, P.O Box 30307, Mail Stop 010, North Las Vegas, Nevada
89036-0307

Submitted By:

The Esmeralda County Board of Commissioners on February 1, 2000

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General Comments:

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1. A significant concern to the people of Esmeralda County and particularly those residing in Goldfield, is the transportation of nuclear material. Esmeralda County believes that it is highly likely that political considerations will result in the county serving as a major corridor for nuclear waste transportation to the Yucca Mountain Site. Spent nuclear fuel and high-level radioactive waste will likely be transported through Esmeralda County by either legal weight truck, heavy-haul truck, rail or a combination of modes. The Draft EIS identifies a number of impacts resulting from transportation of the nuclear material without mention of any mitigation measures that will be taken to minimize these impacts. **DOE needs to address mitigation measures in detail.**

2. Is the Department not addressing impact mitigation because it assumes that impact mitigation will be achieved through implementation of Section 116c (2) of the Nuclear Waste Policy Act?

If yes, does the Department intend to work directly with each Affected Unit of Local Government to address impact mitigation needs?

In accordance with NEPA the Department should develop specific measures to mitigate impact. These measures should be described in detail in the EIS.

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3. The EIS should consider transportation routing alternatives which both minimize negative consequences and enhance opportunities. For example route and mode alternatives which maximize access to mineral resources in the County should be considered.

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Specific Comments:

- 5 1. In the section that discusses heavy-haul highway routes (Pg. 2-54), the DEIS identifies that shoulder widening and the construction of turnout and truck lanes would occur as needed along the side of the existing pavement and shoulders would be widened from 1 to 4 feet. **The shoulders should be widened sufficiently for the transporter to be pulled off the main part of the road and away from the fast moving traffic.**
2. Also, DOE only proposes to provide turnouts every 5 to 20 miles. Along U.S. 95 turnouts at 5 miles would be insufficient and would create additional risk to travelers. People are accustomed to traveling along this route at a high rate of speed. If travelers were forced to follow a long slow moving convoy carrying nuclear waste, drivers would make risky vehicle passes for the purpose of decreasing travel time. **DOE should plan to construct two lanes each way if heavy-haul transporters are used.**
- 6 3. The EIS needs to address what corrective measures will be taken to make the right bend just south of the center of the Town of Goldfield safe for other drivers. In addition, there is insufficient room for the heavy-haul transporter to pull over to the side of the highway in the more populated business district of Goldfield. If the transport vehicle had a breakdown in Goldfield, there would be no place to pull the vehicle to the side and out of the way of the travel lane. This situation could be mitigated by constructing a roadway that by-passes the center of Goldfield. **The EIS should include a by-pass route and address methods for mitigating any potential adverse socioeconomic impacts of a by-pass.**
- 7 4. In the discussion of the socioeconomic impacts associated with construction of the Caliente (Pg. 6-57) and Carlin (Pg. 6-63) rail route, the DEIS identifies that the annual average number of construction workers would be 500 to 560 and that there would be 5 construction camps. One of the camps would most likely be in the vicinity of Goldfield and would have a significant impact on this community. The EIS needs to address this impact and how it will be mitigated. **These mitigation measures could include financial assistance and temporary structures to accommodate the additional workers and their families.**

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- 8 4. Table 6-20 (Pg. 6-57) identifies impacts to workers from industrial hazards during construction and operation. In Esmeralda County and the nearby sections of Nye County along U.S. 95, there are no medical facilities. Esmeralda County needs to have assistance from DOE to be able to have adequate medical facilities in order to provide any necessary medical care. **The EIS should include a detailed description of financial assistance for medical facilities, equipment and staffing.**
- 9 5. In the Socioeconomic Section (Pg. 6-57), the Draft EIS discusses the impacts to employment, population and real disposable income for Clark, Nye and Lincoln Counties, but fails to even mention Esmeralda County, even though 50-100 miles of rail corridor is in or near Esmeralda County. There are bound to be impacts to Esmeralda County during the construction of either of the rail alignments. DOE needs to address these impacts in the EIS.
- 10 6. In the Cultural Resources Section (Pg. 6-94) discussing the impacts of heavy-haul of the large rail casks, DOE identifies that no additional direct or indirect impacts would be likely to historic sites from operations of heavy-haul trucks along any of the routes. With the older historic buildings in Goldfield within 10 feet of the highway, we do not agree with this statement. Especially when you consider there may be 4-5 heavy-haul trucks per day going through Goldfield for 24 years. As there is no room available to widen the highway through Goldfield, it would be necessary to build a roadway around the business section of the town to address this impact.
- 11 7. In the section titled Occupational and Public Health and Safety (Pg. 6-95), you discuss traffic fatalities along the heavy-haul routes. Your analysis should also discuss the potential increase in accidents where there are large, slow moving truck convoys along a two lane highway with generally little shoulder and where people are used to traveling at high rates of speed.
- 12 8. The Socioeconomic Section (Pg. 6-96) discusses the impacts of heavy-haul of large rail casks, but totally fails to address the impacts to the quality of life to the residents of Goldfield and other rural communities resulting from 4-5 of these large trucks, along with their remaining convoy coming through our community every week day for 24 years. Again, the mitigation measure to alleviate this situation is to construct a roadway around the populated section of town.

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9. In the section titled Noise (Pg. 6-97) from heavy-haul trucks, you identify that under certain conditions, the noise level would be 45 dBA at about 2100 feet from the road (that's almost a half mile). The Esmeralda County Courthouse in Goldfield is about 10 feet from the highway. What would the noise level be there? Also, what would be the vibration level in the building? This could be very disturbing to the county employees working in the building and to day time meetings that occur when there are 4-5 of these convoys coming through Goldfield every week day.

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